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NTC SAN DIEGO  
SSIC #5090.3

## THE CITY OF SAN DIEGO

February 2, 1998

Mr. Keith S. Forman  
BRAC Environmental Coordinator  
Naval Training Center-San Diego  
2860 Sims Road, Building 23  
San Diego, CA 92106

Dear Mr. Forman:

Subject: Draft Base Realignment and Closure Cleanup Plan (BCP)

I have reviewed the draft BCP report and have a few comments. My comments are referenced to page and section and are as follows:

Page	Section	
1-5	1.3	The BCP Project Team membership has changed with the designation of the RWQCB as the lead California agency and the Cal-EPA representative being taken off the team. This change should be noted.
3-8	3.12	POI 4: In December 1997 and January 1998 City staff performed reinspections of buildings 286, 287, 288, 298 and 499. The purpose was to clearly identify all asbestos and lead materials that would be required to be removed prior to demolition. The reinspection brought to light many discrepancies between the City's findings and the Navy's findings. The City reinspection found Asbestos Containing Material (ACM) in Building 499 where it was not found by the Navy.

In light of the discrepancies found, this raises questions as to the accuracy of all asbestos and lead assessments performed by the Navy.

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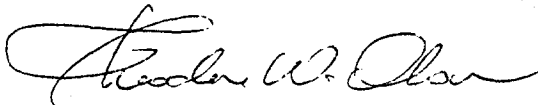


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I strongly recommend that the Navy's ACM policy be readdressed to allow the Navy to perform ACM abatement after the time of property transfer if additional friable, accessible or damaged (FAD) asbestos is found.

Please do not hesitate to contact me at 573-1266 if you have any comments or questions.

Sincerely,



THEODORE W. OLSON, R.E. A.  
UST Program Manager

TWO:res

cc: Richard L. Hays, Environmental Services Director  
Robert A. Epler, Assistant Environmental Services Director  
Robert J. Ferrier, Deputy Environmental Services Director/Refuse Disposal  
Betsy Weisman, NTC Project Manager  
Alan Johanns, Asbestos and Lead Program Manager  
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